

STATEMENT OF SUSPECT/WITNESS/COMPLAINANT					<input type="checkbox"/> SUSPECT <input checked="" type="checkbox"/> WITNESS/COMPLAINANT
PRIVACY ACT STATEMENT					
AUTHORITY: 10 U.S.C. 9013, Secretary of the Air Force; 18 U.S.C. 922 note, Unlawful Acts note referring to the Brady Handgun Violence Prevention Act; 28 U.S.C. 534 note, Judiciary and Judicial Procedures, note referring to the Uniform Federal Crime Reporting Act; 34 U.S.C. 20101 et seq., Crime Victims Fund; and Amendment to Lautenberg, 18 U.S.C. 922(d) (9) Unlawful Acts; DoD Directive 7730.47, Defense Incident-Based Reporting System (DIBRS); SORN F031 AF SF B; and E.O. 9397 (SSN), as amended.					
PRINCIPAL PURPOSES: Used to record information and details of criminal activity which may require investigative action by commanders, supervisors, AF entities conducting law enforcement functions; and to provide information to appropriate individuals within DoD organizations who ensure proper legal and administrative action is taken.					
ROUTINE USES: Information may be disclosed to local, county, state, and federal law enforcement/investigative authorities for investigation and possible criminal prosecution or civil court action. Information extracted from this form may be used in other related criminal and/or civil proceedings.					
DISCLOSURE IS VOLUNTARY: SSN is used to positively identify the individual making the statement.					
I. STATEMENT INFORMATION					
DATE (YYYYMMDD)	TIME	LOCATION AND INSTALLATION (Bldg/Room No)	UNIT TAKING STATEMENT	REPEAT (If known)	
20200910	11:33	3133 General Hudnell Dr, Suite 200 San Antonio, TX, 78226	AFLCMC/HNCO	<input type="checkbox"/> OFFENSE <input type="checkbox"/> COMPLAINT	
II. PERSONAL IDENTIFICATION(Print or Type)					
NAME (Last, First, Middle Initial)		SSN	STATUS/GRADE		
McVeigh, William, M.		[REDACTED]	O4		
LOCAL ADDRESS (Include Zip Code)		DATE AND PLACE OF BIRTH (If required)		TELEPHONE	
[REDACTED]		[REDACTED]		HOME	DUTY
[REDACTED]		[REDACTED]		[REDACTED]	[REDACTED]
PERMANENT ADDRESS OR HOME OF RECORD (Include Zip Code)		MILITARY ORGANIZATION/EMPLOYER		DEROS	
[REDACTED]		[REDACTED]		[REDACTED]	
SPONSOR INFORMATION					
NAME (Last, First, Middle Initial)		GRADE	SSN	ORGANIZATION	DUTY PHONE
III. ACKNOWLEDGEMENT OF OFFENSES AND 5TH AMENDMENT/ARTICLE 31 RIGHTS ADVISEMENT (Suspect Only)					
I have been advised that I am suspected of the following offenses:					
ADVISED BY (Full Name and Rank)			INDIVIDUAL IDENTIFIED HIMSELF/HERSELF AS A (SF, special agent, etc.)		
SUSPECT INITIALS	and advised me that I have the following rights according to the 5th Amendment of the U.S. Constitution/Article 31 of the Uniform Code of Military Justice.				
	I have the right to remain silent - that is to say nothing at all.				
	Any statement I make, oral or written, may be used as evidence against me in a trial or in other judicial, non-judicial, or administrative proceedings.				
	I have the right to consult with a lawyer.				
	I have the right to have a lawyer present during this interview.				
	I may obtain a civilian lawyer of my own choice at no expense to the government.				
	I may request a lawyer any time during this interview.				
	If I decide to answer questions with or without a lawyer present, I may stop the questioning at any time.				
	MILITARY ONLY: If I want a military lawyer, one will be appointed for me free of charge.				
	CIVILIANS ONLY: If I cannot afford a lawyer and want one, a lawyer will be appointed for me by civilian authorities.				
SUSPECT INITIALS	I have read my rights as listed above and I fully understand my rights. No promises, threats, or inducements of any kind have been made to me. No pressure or coercion has been used against me. I make the following choice. (Initial One)				
	I do not want a lawyer. I am willing to answer questions or make a statement or both, about the offense(s) under investigation.				
	I do not want a lawyer and I do not wish to make a statement or answer any questions.				
	I want a lawyer. I will not make any statement or answer any questions until I talk to a lawyer.				
I fully understand my rights and that my signature does not constitute an admission of guilt.					
SIGNATURE OF SUSPECT			SIGNATURE OF WITNESS/INTERVIEWER		

AF IMT 1168, 19980401, V2

PREVIOUS EDITIONS ARE OBSOLETE.

DEFENDANT'S
EXHIBIT

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IV. STATEMENT

- On 22 July 20, SAF/AQL visited [REDACTED] for a demo. They requested a meeting and told us to update documentation for the DD254 for the contractor on 23 July 20 with HNCO. Mr. Daniel Brown stated at this time to SAF/AQL, the ML, AFRL, the PSO, and I that he had requested AFRL process a DD254. However, AFRL (Mr. John Marx and Ms. Amanda Ozanam) told me that they received no such request from Mr. Brown.

- On ~4 Aug 20, I was notified by SAF/AQL that \$300k for SETA support had not been obligated on the AFRL ACT2 (Excalibur/Mercury) contract. From there, I asked Daniel Brown what the funding was used for to ensure it was used for SAF/AQL projects. I was informed it was for Dr. Paul [REDACTED] as contractor support. During discussions between AFRL and Mr. Brown, it was further identified that although informed to SAF/AQL as SETA funds it was really for Technical Subject Matter Experts (SME).

- On 18 Aug 20, after the SAF/AQL Program Management Review (PMR), Dr. [REDACTED] told me he was a contractor, but he was acting and representing himself as a Government employee during the PMRs. He used his Government ID to access HNCO facilities.

- On 19 Aug 20, Richard Ranft and I learned that Dr. [REDACTED] only had a Government clearance and no contractor clearance.

- On roughly 20 Aug 20, I learned that Dr. [REDACTED] was being paid as both a contractor and Government employee. Talking with Dan Brown, Dr. [REDACTED] was only doing unclassified work, however, no DD254 was ever created or submitted for him for the project.

- I asked SAF/AQL, Joseph "Danny" Burghard if he knew that Dr. [REDACTED] was a contractor. He told me his entire team did not know that information. Mr. Brown told me that he informed Mr. Burghard once of this fact during a POM discussion in 2019.

- On 24 Aug 20, I notified AFRL/RIGA (Thomas "Tom" Parisi and Tanya Macrina) of a possible conflict of interest or fraud.

- In early Sep, I learned that Dr. [REDACTED] was being paid ~\$215 per hour and that Dr. [REDACTED] was working between 20 hours a week starting in approximately Apr 19. Mr. Oakley told me that Mr. Brown authorized 40 hours a week sometime within the last year.

- Dr. [REDACTED] informed Mr. Brown on roughly 20-21 Aug that he was going to depart the NSA for another position. This statement was made after Mr. Brown requested the legal letter from Dr. [REDACTED]

- The legal reading from NSA stated that Dr. [REDACTED] could not represent himself to the Government as a GITI employee or work on a program he worked on in a Government capacity. However, he did that on multiple occasions while Mr. Brown was witting of that activity. It also did not have any dates or signatures on the email.

- During discussions with Lt Col Jared Ekholm, Daniel Brown, and Richard Ranft, there were multiple DD254s identified that have not been processed. Lt Col Ekholm tasked me to provide him a report with the status of all payloads projects and their DD254s.

- Lt Col Ekholm decided that Daniel Brown would be replaced on the project with Julio Guerrero and Ben Arnold.

- On roughly 27 Aug, the Program Manager at Global Info Tek Inc (GITI), Theodore "Ted" Oakley, informed me that Dr. [REDACTED] had pushed code to a public password protected GitHub repository. This code was not security reviewed. Previously, all code was identified as being offline and not on any internet connected repository. Mr. Oakley told me that Mr. Brown reviewed and approved the monthly status report from Dr. [REDACTED] that contained the GitHub addresses. Mr. Oakley also informed me that GITI issued a stop work for Dr. [REDACTED] after these issues emerged.

- During and after these events, Mr. Brown did show me several emails back in March that identified some work on classified systems to start DD254s, but nothing for Dr. [REDACTED]

- Richard Ranft also told me that Mr. Brown was told not to reuse clearances in 2019 by Maj Perez-Castle for another project.

- I believe Mr. Daniel Brown repeatedly violates security practices and processes that he believes slows things down or to avoid work. He claims that everything is unclassified and appears to avoid ensuring program protection is in place. He claims program managers within his section were tasked, but rarely follows up to ensure documents are completed. If anyone else had done what Mr. Brown did, they would have been removed from the vault.

V. OATH/SIGNATURE

"I hereby voluntarily and of my own free will make this statement without having been subjected to any coercion, unlawful influence, or unlawful inducement. I swear (or affirm) I have read this statement, initialed all pages and corrections, and it is true and correct to the best of my knowledge."

SIGNATURE OF PERSON MAKING STATEMENT

SIGNATURE OF WITNESS/INTERVIEWER

*Subscribed and sworn to before me, a person authorized by law to administer oaths, this _____ day
of _____, _____ (year).*

SIGNATURE OF PERSON ADMINISTERING OATH

VI. INSTRUCTIONS FOR CONTINUATION PAGE(S)

Use plain bond paper (both sides optional). At the top right of each page, print or type "(Last name of individual making the Statement) on (Date)." At the bottom of each page, print or type: "Page ____ of ____ Pages." The individual must initial the top and bottom entries and sign his/her name at the bottom of each page.